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Counsel for Defendant Trans Union, LLC

**UNITED STATES DISTRICT COURT
 NORTHERN DISTRICT OF CALIFORNIA**

DIVISION

KAREN SOVATH,
 Plaintiff,

vs.

EXPERIAN INFORMATION SOLUTIONS, INC.;
 EQUIFAX, INC.; TRANSUNION, LLC;
 MARRIOTT OWNERSHIP RESORTS, INC.;
 V.W. CREDIT, INC.; CAPITAL ONE
 FINANCIAL CORPORATION; NORDSTROM
 fsb; GENERAL ELECTRIC CAPITAL RETAIL
 BANK; TOYOTA FINANCIAL SERVICES AND
 DOES 1 through 100 inclusive;

Defendants.

CASE NO.

**TRANS UNION, LLC'S NOTICE
 OF REMOVAL**

Pursuant to 28 U.S.C. §§ 1331, 1441, and 1446, Defendant Trans Union, LLC, ("Trans Union") hereby removes the subject action from the Santa Clara County, Superior Court of California, to the United States District Court for the Northern District of California, on the following grounds:

1. Plaintiff Karen Sovath served Trans Union on or about August 20, 2015, with a Summons, Complaint for Damages, Civil Lawsuit Notice and Alternative Dispute Resolution Information Sheet filed in the Santa Clara County, Superior Court of California. Copies of the Summons, Complaint for Damages, Civil Lawsuit Notice and Alternative Dispute Resolution

TRANS UNION, LLC'S NOTICE OF REMOVAL – [CASE NO.]

1 Information Sheet are attached hereto as Exhibit A through Exhibit D, respectively. No other
2 process, pleadings or orders have been served on Trans Union.

3 2. Plaintiff makes claims under, alleges that Trans Union violated and alleges that
4 Trans Union is liable under the Fair Credit Reporting Act, 15 U.S.C. § 1681 et seq. (the
5 “FCRA”). See Complaint ¶¶ 1, 5-17, 20-26.
6

7 3. This Court has original jurisdiction over the subject action pursuant to 28 U.S.C.
8 § 1331 since there is a federal question. As alleged, this suit falls within the FCRA which thus
9 supplies this federal question.

10 4. Pursuant to 28 U.S.C. § 1441, et seq., this cause may be removed from the Santa
11 Clara County, Superior Court of California, to the United States District Court for the Northern
12 District of California.
13

14 5. To the best of Trans Union’s knowledge, the other name Defendants in this matter
15 have not been served as of the date of this Notice Of Removal. Trans Union has confirmed with
16 the Clerk of the Superior Court of Santa Clara County, California, both online and by telephone,
17 that they have no document or file suggesting any other Defendant has been served.
18

19 6. Notice of this removal will promptly be filed with the Santa Clara County,
20 Superior Court of California and served upon all adverse parties.

21 WHEREFORE, Defendant Trans Union, LLC, by counsel, removes the subject action
22 from the Santa Clara County, Superior Court of California to this United States District Court,
23 Northern District of California.
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25
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28

Respectfully submitted,

Date: August 24, 2015

s/ Monica Katz-Lapides
Monica Katz-Lapides, Esq. (CSB #267231)
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Counsel for Defendant, Trans Union, LLC

PROOF OF SERVICE

I, Monica Katz-Lapides, declare that I am a resident of the State of California, am over the age of eighteen years and am not a party to the within action. I am employed with Tate and Associates, whose address is 1321 8th Street, Suite 4, Berkeley, CA. On **August 24, 2015**, I served the following documents:

TRANS UNION, LLC'S NOTICE OF REMOVAL

I served the documents on the persons listed below, as follows:

[]	By messenger service. I served the documents by placing them in an envelope or package addressed to the persons listed below and providing them to a professional messenger service for service. (A declaration by the messenger is attached hereto as a separate document.)
[X]	By United States mail. I enclosed the documents in a sealed envelope or package addressed to the persons listed below and placed the envelope or package for collection and mailing in accordance with our ordinary business practices. I am readily familiar with my firm's practice for collecting and processing correspondence for mailing. On the same day that correspondence is placed for collection and mailing, it is deposited in the ordinary course of business with the United States Postal Service, in a sealed envelope with postage fully prepaid. I am a resident or employed in the county where the mailing occurred. The envelope or package was placed in the mail at Berkeley, CA.

All documents were sent to the following persons in the following manner:

Scott J. Sagaria, Esq.
 Elliot W. Gale, Esq.
 Sagaria Law, P.C.
 2033 Gateway Place, 5th Floor
 San Jose, CA 95110

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct, and that this Proof of Service was executed on this **24th** day of **August, 2015**, at Berkeley, CA.

TRANS UNION, LLC'S NOTICE OF REMOVAL – [CASE NO.]

s/ Monica Katz-Lapides

Monica Katz-Lapides, Esq. (CSB #267231)

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